

U.S. DISTRICT COURT
EASTERN DISTRICT-WI
FILED
UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA, **STEPHEN C. DRIES**
CLERK

19-CR-101

Plaintiff,

v.

Case No. 19-CR-
[18 U.S.C. § 1343]

WENDY YANOW,

Defendant

INFORMATION

THE UNITED STATES ATTORNEY CHARGES:

1. At all times relevant to this Information, the defendant, Wendy Yanow ("Yanow"), resided in the Thiensville, Wisconsin and was the treasurer of an investment club named Women of Wealth, which typically met every month at different locations in the Eastern District of Wisconsin.

2. Women of Wealth was an investment club founded in 1995 by five original members. Over the years, the size of the group increased and, by 2018, there were 12 members including Yanow.

3. Beginning in approximately 2002 and continuing until approximately December 2018, in the state and Eastern District of Wisconsin and elsewhere,

WENDY YANOW,

with the intent to defraud, knowingly devised and executed a scheme to defraud members of the Women of Wealth investment club and to obtain money from them by means of materially false and fraudulent pretenses and representations (the "scheme").

4. For purposes of executing her scheme, Yanow used and caused the use of interstate wire communications.

The Scheme to Defraud

5. Each member of Women of Wealth contributed approximately \$50 to the group each month and the group would collectively decide how to invest the money. At each meeting, members of the group provided Yanow with personal checks in the amount \$50 believing that Yanow took the money, deposited it in a bank account, and purchased the stocks the group had selected.

6. For the first seven years of the club's existence, Yanow deposited the checks into a bank account in Women of Wealth's name, for which she was the signatory, and transferred the money to a ScottTrade account to buy the agreed-upon stocks.

7. In 2002, Yanow stole the money in the ScottTrade account. She also began diverting the monthly checks she received from club members for her own personal use. Yanow continued depositing the checks into the Women of Wealth bank account each month, but instead of purchasing the agreed-upon stocks, she took the money out of the account for personal use.

8. From 2002 until the end of her scheme, Yanow represented to the group that she purchased the stocks as instructed when she did not. From 2002 to 2008 she used an AOL and then Yahoo! stock-tracking tool to conceal her scheme to defraud. Using this tool, she was able to track the purported investments and their growth, and then could summarize that information to the group.

9. Beginning in 2008 and continuing through the end of her scheme, Yanow used bivio, which is accounting software for investment groups, to help conceal her scheme to defraud. Relying on information entered by Yanow, bivio tracked the stocks that Yanow falsely claimed she purchased for the group, the performance of those stocks, and each member's contributions.

10. From at least 2002 until the end of the scheme, Yanow sent members a monthly report (relying on AOL, Yahoo! or bivio) purporting to track each member's investment. In reality, however, Yanow did not invest the members' contributions and merely entered into the stock-tracking tools (AOL, Yahoo! or bivio) stock purchases that Yanow never made. By the end of the scheme, Yanow (through bivio) reported to the members of Women of Wealth that they had accumulated \$426,623.46 in stocks, when in reality there was nothing.

Execution of the Scheme

11. Beginning in 2014 and continuing through the end of her scheme, Yanow deposited the monthly checks she received from the group members into Women of Wealth's BMO Harris Bank account before stealing the money.

12. Any time an individual makes a deposit into a BMO Harris account, the bank sends an interstate wire communication to the its offices in Naperville, Illinois, to process the deposit.

13. Through her scheme, Yanow stole \$81,382.48 of contributions from the Women of Wealth investment club.

14. On or about November 21, 2016, in the State and Eastern District of Wisconsin and elsewhere,

WENDY YANOW,

for the purpose of executing her scheme, knowingly and with intent to defraud, used and caused the use of interstate wire communications from the Eastern District of Wisconsin to Naperville, Illinois, by depositing \$700 in Women of Wealth's account at BMO Harris, which funds Yanow later diverted to her personal use.

All in violation of Title 18, United States Code, Section 1343.

6/3/19
Date

Kelly D. Wagner
for MATTHEW D. KRUEGER
United States Attorney